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November 6, 2002

***Ex Parte***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-B204  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 -- Application of Qwest Communications International Inc. for Authorization to Provide In-Region InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming**

**Subject: Qwest's Stand Alone Test Environment (SATE)**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") hereby submits this response to questions from the Commission staff regarding Qwest's Stand Alone Test Environment (SATE).

We note that with this filing, Qwest is replacing one of the exhibits attached to the Qwest III Reply Declaration of Lynn M V Notarianni and Christie L. Doherty on Operation Support Systems (OSS) (Reply Exhibit LN-16). That exhibit was intended to be the minutes from the December 4, 2001, meeting of the SATE Users Group. Instead, only the agenda for that meeting was attached as the exhibit. The correct Reply Exhibit LN-16 is included with this filing as Attachment 1.

The following are Qwest's responses to the staff's questions.

**1. Qwest's policy for adding test scenarios to SATE.**

Under the standard procedures for SATE, Qwest will add a new test scenario at the request of a CLEC, but will not add that as a standard test scenario for current and future releases unless the scenario is requested by more than one CLEC. This approach ensures that the Data Document is not constantly changing, and Qwest avoids cluttering up the

SATE Data Document with unnecessary test scenarios created at the request of an individual CLEC.

CLECs are aware of this approach and have agreed to it. As noted in the Qwest III OSS Reply Declaration of Lynn M V Notarianni and Christie L. Doherty, this approach was discussed at a December 4, 2001, SATE Users' Group meeting and agreed to by participating CLECs. This understanding is documented by the following extract from those meeting minutes, which were distributed to all CLECs on the CMP distribution:

As there can be an infinite number of test scenarios, Qwest has included on the data document the scenarios required of the CLECs for certification along with the most common test scenarios. If a CLEC needs an additional test scenario, they can work to find data that meets their need. This can be accomplished by their Qwest BA [Business Analyst] immediately providing the data or by the BA recommending that the CLEC submit a Data Request. If Qwest finds that several CLECs are requesting a particular scenario, Qwest will add that scenario to the next release of the Data Document. The CLECs agreed with this approach.<sup>1</sup>

This process is also reflected in SATE documentation available on the public wholesale website.<sup>2</sup>

Qwest responds to all CLEC requests to add additional test scenarios in the same manner, on a non-discriminatory basis. Furthermore, the addition of test scenarios to the Data Document when requested by multiple CLECs is also non-discriminatory. CLECs request additional data scenarios specific to their test needs because they believe such data is necessary for their testing and/or test environment. As all CLECs have the ability to make these additional scenario requests, Qwest's process is non-discriminatory.

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<sup>1</sup> Minutes of SATE Users' Group Meeting (December 4, 2001), Attachment 1 to this filing. As stated above, this document was intended to be included as Qwest III OSS Reply Exhibit LN-16, but inadvertently only the meeting agenda was included as that exhibit.

<sup>2</sup> See IMA EDI Implementation Guidelines for Interconnect Mediated Access, Qwest II OSS Declaration, Exhibit LN-OSS-56, version 10.0, at 37; SATE Data Document, Qwest II OSS Declaration, Exhibit LN-OSS-57, version 10.02, at 4. Updated versions of these documents are available on the Qwest Wholesale Website at [www.qwest.com/wholesale/clecs/ima/edi/document.html](http://www.qwest.com/wholesale/clecs/ima/edi/document.html).

An agreed-upon process between the CLECs and Qwest was established and documented. CLECs have not requested to change this process, but may do so if they wish.

**2. Use of the Change Management Process for adding products to SATE.**

As agreed in the July 23, 2002, CMP redesign meeting, new products implemented into production are also implemented into SATE, beginning with Release 12.0. AT&T's position here is specific to the subset of low-volume, remaining products that are in production but not yet in SATE. *See* AT&T Qwest III Comments at 64-65.

As discussed in Qwest's earlier Section 271 filings, Qwest issued change requests (CRs) for these products for the CLECs to prioritize based on the then existing CMP CR process, and the CLECs prioritized only two of those high enough to be added to SATE in IMA 11.0. *See, e.g.*, Qwest III OSS Reply Declaration at ¶ 165; Qwest II OSS Declaration at ¶ 757. The two products were implemented into SATE on October 19, 2002.

The issue of adding these limited products to SATE was taken to impasse in the Arizona 271 proceedings. Qwest has presented a compromise position in the Arizona proceedings. Qwest has proposed that those remaining products can be implemented into SATE after the volume of CLEC use for each of the relevant product(s) reaches 100 EDI transactions during the prior twelve (12) month period. *See* Qwest III OSS Reply Declaration at ¶ 166 and Reply Exhibit LN-14.

AT&T accepted Qwest's compromise position, indicating its agreement with this proposal regarding adding products to SATE in a September 30, 2002, e-mail from John Finnegan. *See* Qwest III OSS Reply Declaration at Reply Exhibit LN-15 (September 30, 2002, e-mail from John Finnegan, AT&T, re SATE impasse issues). Further, the ACC no longer considers this issue at impasse. *See* AZ TAG Meeting Minutes, October 11, 2002 (Attachment 2 to this filing).

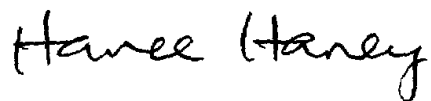
There is nothing "time-consuming" or "cumbersome" about having products added to SATE through the change management process. That process was developed on a collaborative basis by Qwest and the CLECs. Beginning with Release 12.0, new products are added automatically to SATE, and a compromise has been reached on a process for adding the remaining low volume products to SATE. That compromise addresses the concerns voiced by AT&T in its Qwest III comments. Moreover, the existing SATE functionality now includes all products for which CLECs have been EDI certified for production.

**3. Meaning of term "bug" in connection with SATE and change management procedures.**

In the Qwest I Application, as well as in subsequent applications, Qwest utilized the term "bug" fixes when describing how Qwest's SATE is a stable testing environment. *See* OSS Declaration of Lynn M V Notarianni and Christie L. Doherty at ¶ 731. As explained in the Qwest II Notarianni/Doherty OSS Declaration at ¶ 716, "bug" fixes are production support changes necessary to correct software problems that are identified during the pre-implementation testing period prior to implementing a major release. Through jointly agreed upon Change Management Procedures (the "CMP Framework"), Qwest and the CLECs established procedures whereby Qwest is to provide CLECs with a stable test environment for 30 days prior to implementation of a new major release, subject only to changes identified through the production support process ("bug fixes"). Section 8.1.6 of the CMP Framework provides that "Qwest will provide a thirty (30) day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production date." Section 11.1 provides that "[p]roduction code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 12.0."<sup>3</sup> Section 8.1.5 of the CMP Framework provides that "Production Support type of changes that occur within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change."<sup>4</sup>

The 20-page limit does not apply to this filing.

Sincerely,



Enclosures

cc: E. Yockus  
M. Carowitz  
G. Remondino  
J. Myles  
R. Harsch  
J. Jewel  
P. Baker

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<sup>3</sup> *See* Qwest III, Change Management Reply Declaration of Dana L. Filip, Reply Exhibit DLF-1 (CMP Framework), Sections 8.1.5, 8.1.6, and 11.1.

<sup>4</sup> Since the filing of the Qwest II application, the CMP Framework has been revised and renumbered in certain respects. *See* Qwest II, Change Management Declaration of Dana L. Filip, DLF-CMP-2 (CMP Framework), Sections 8.1.7, 8.1.8, and 11.1.

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